

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE RESPONSE  
TO CITY OF NEW ORLEANS INTERROGATORIES  
(CNO/USPS—5-7)  
(June 21, 2012)**

The United States Postal Service files its responses to the above-listed interrogatories of the City of New Orleans, dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE  
TO CITY OF NEW ORLEANS INTERROGATORY

**CNO/USPS-5**

Please produce any and all documents, including but not limited to communications and work papers, which were reviewed, considered or generated in connection with the decision (discussed in CNO/USPS-1) to include the New Orleans Processing and Distribution Facility on the September 15 study list despite the facility being identified as an activated facility by witness Rosenberg.

**RESPONSE**

No formal documentation exists. The decision to add the New Orleans Plant to the study list was made to facilitate evaluation of the feasibility of and business case for its potential consolidation and was communicated orally.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO CITY OF NEW ORLEANS INTERROGATORY

**CNO/USPS-6**

Please produce any and all Area Mail Processing studies identified in CNO/USPS-2.

**RESPONSE**

Please see the URL provided below for information regarding the New Orleans and Lafayette AMPs.

<http://about.usps.com/streamlining-operations/area-mail-processing.htm#b>

RESPONSE OF UNITED STATES POSTAL SERVICE  
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**CNO/USPS-7**

Please produce any and all documents, including but not limited to communications and work papers, which were reviewed, considered or generated in connection with any and all Area Mail Processing studies identified in CNO/USPS-2. Please provide all workpapers and other spreadsheets in an electronic format that includes the formulae used to perform the calculations.

**RESPONSE**

Please see the response to CNO/USPS-6 above.